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# Before the Federal Communications Commission Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

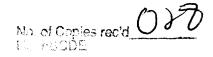
In the Matter of	)	
Advanced Television Systems	) ) N	/IM Docket No. 87-268
and Their Impact upon the	Ć	
Existing Television Broadcast	)	
Service	)	

To: The Commission

### REPLY TO COMMENTS ON FURTHER PETITION FOR RECONSIDERATION

Maranatha Broadcasting Company, Inc. ("MBC"), through counsel, hereby submits this brief Reply to Comments by Mountain Broadcasting Corporation ("Mountain") on MBC's Further Petition for Reconsideration of the FCC's *Memorandum Opinion and Order* in MM Docket No. 87-268, FCC 98-024, released February 23, 1998 (the "MO&O"). In its Further Petition, MBC suggested the possible assignment of Channel 8 as a paired DTV channel for WWAC-TV, Atlantic City, New Jersey, to eliminate the egregious short-spacing between the Channel 46 DTV allotments for MBC's WFMZ-TV, at Allentown, Pennsylvania, and WWAC-TV. Mountain, in its Comments, asserted that DTV operation on Channel 8 at Atlantic City, as suggested by MBC, would result in additional interference to the NTSC signal of WGAL-TV, Lancaster, Pennsylvania, and to Mountain's DTV operation at Newton, New Jersey, although Mountain acknowledged in its engineering statement that the increase in interference to its DTV operation would be *de minimus*.

This Reply is filed out of time; however, good cause exists to permit its filing. Mountain's Comments, although dated May 22, 1998, were received by MBC's counsel on June 6, 1998, unpostmarked. MBC makes no claim that Mountain's Comments were not filed and served as



represented in the Certificate of Service attached to the Comments. MBC only notes that, apparently, the Postal Service mishandled the mail and delivery. Additional delay in preparing this response was engendered when MBC's technical consultant, Robert W. Fisher, in reviewing Mountain's Comments, encountered what he describes as "a program error in the FCC's FLR program which caused as undercounting of the population in high density population group blocks." *See* Mr. Fisher's statement, "Review and Clarification of Exhibit 1," attached hereto. Over an extended period of time, Mr. Fisher worked to remove this "bug" from the program. The delay in filing this Reply, therefore, is attributable to reasons beyond MBC's control and should be excused.

The attached statement reflects Mr. Fisher's re-analysis of the proposed Channel 8 DTV allotment at Atlantic City, using a corrected version of the FCC's program. It shows (1) increase in interference to Mountain's DTV channel of 0.0012 percent, which Mr. Fisher describes as "below the threshold of accuracy for these methods;" (2) a decrease in interference of 0.176 percent to WBFF-TV, Channel 45, Baltimore, Maryland; and (3) an increase in interference to WGAL-TV, Lancaster, by 2.84 percent more than allowed in the Table of Allotments adopted in the *Sixth Report and Order*, 12 FCC Rcd 14588 (1997). Although WGAL-TV would receive additional interference, as Mr. Fisher points out in his statement, the total amount of interference is well within the range to which many stations have been subjected in order to achieve the FCC's goal of providing a paired DTV channel to each operating NTSC station.

Mr. Fisher's analysis shows that the proposed substitution of DTV Channel 8 for DTV Channel 46 is viable and comparable to other DTV allotments made in the Sixth Report and Order.

Of at least equal importance, it shows the arbitrariness and capriciousness of the FCC's determination, in evaluating Petitions for Reconsideration of individual allotments in the Sixth Report

and Order, to impose the burden of proposing a specific substitute allotment, and where necessary securing the consent of potentially affected stations, on the petitioner. Virtually no engineering consultant in the private sector claims to be able to replicate the FCC's data. Mountain's consulting engineers claim only to have assessed the proposed Channel 8 assignment using "general FCC procedures outlined in OET Bulletin No. 69 and the FCC's DTV Proceeding" implemented in a program "similar to the FCC algorithm." (Emphasis supplied.) And, as Mr. Fisher shows, even the FCC's own program was flawed, leaving open to question the FCC's own results, as reflected in the Sixth Report and Order, and the FCC's comparisons of its data to the data offered by individual petitioners. Given the inevitable conflict between the FCC's data and the programs on which the private sector is dependent, the ability of petitioners to propose an allotment which satisfied the FCC's criteria was problematic.

For the foregoing reasons, including delay in service and the delay caused by the discovery of an error in the FCC's own computer program, the FCC should accept this Reply. In addition, the FCC should grant the relief sought in MBC's Further Petition for Reconsideration. It should either adopt one of the proposed substitute DTV allotments for WWAC-TV at Atlantic City or, utilizing its own program -- and the correct antenna pattern for WFMZ-TV, which has been inserted in the

FCC's data base since the release of the MO&O -- devise a new pair of DTV allotments for WFMZ-TV and WWAC-TV that eliminates the serious short-spacing between the two stations' DTV operations.

Respectfully submitted,

MARANATHA BROADCASTING

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July 30, 1998

Review and Clarification of Exhibit 1: Technical Discussion in Support of Request for Modification of DTV Table of Allotments with Regard to DTV Channel 46, Atlantic City NJ.

**.** J9M-14-122 Z5.45 .....

In reviewing the previous request for modification of the DTV table and the opposition filed by Mountain Broadcasting Corporation (Mountain), it is apparent that the following issues are relevant to the consideration of the proposal:

In their opposition, Mountain indicated a discrepancy in the overall population counts in the New York City area, and after careful review of the computer methodology, it was found that a program error had occurred in the FCC's FLR program which caused an undercounting of the population in high density population group blocks. The FCC's FLR program posted on the internet is the distribution specified in the Commission's OET-69 standard, and this version, as of the date of the proposed DTV table modification, contained some errors which would prevent the program from running without some modification. Third Coast had worked directly with the Office of Engineering and Technology to modify this program to run on Third Coast's Sun Microsystems UltraSparc computer, and it was felt that all "bugs" had been removed. However in the "patch" code written for the program, there was a variable used with an insufficient byte width which caused a truncation of the index data on certain high density population blocks, primarily in the New York City and Los Angeles areas. Smaller population blocks were correct and many were used in the verification process prior to running the program. However, in this DTV allotment proposal, the population figures are shown to be different from the FCC table of allotments and accordingly, all data has been re-run for all stations, with all of the Maranatha analyzed stations as well as all of the stations analyzed by Mountain. This data was re-run on the proposed channel 8 with the existing antenna pattern, center of radiation, and 3.2 Kw ERP.

It is important to note that even though there is a match in the NTSC population figures between the analysis and the DTV table, there will not be an exact correlation between the results of the DTV analysis and the DTV figures, due to the further requirement of signal to noise ratio protection at the edges of the noise limited contour of the DTV signal. This analysis was not used by the FCC in the DTV table of allotments, but was an added requirement in the Sixth Report and Order and the Reconsideration of that order. The FCC's FLR computer code used in this analysis uses these required algorithms, in compliance with the rules, and the program used for this analysis was exactly that specified by OET-69, rather than a substitute.

According to the re-run analysis, Mountain's channel 8, WMBC-DT Newton NJ, shows approximately 12 ten thousandths of one percent of additional interference, which is understood to be below the threshold of accuracy for these methods and is proposed to be no real increase in interference. There is also a very slight fractional percentage reduction in the interference to WBFF-DT Baltimore and a 0.176% reduction in interference to WFMZ-DT Allentown by implementing the proposed channel change. All of these percentages are considered to be negligible and to have little, if any, practical effect on the associated stations.

Further analysis indicates that all other stations except WGAL Lancaster PA show no increase in interference by the use of the proposed channel 8. Therefore, the only TV station affected by the proposed channel 8 change is WGAL, Lancaster PA which is shown to have a 2.8% increase in interference during the transition period. As indicated in the initial technical exhibit, this additional interference would not be permitted under the new rules, but is requested in the petition for reconsideration.

The predicted interference caused by the proposed channel change should not be considered as if in a vacuum: the tables of allotments in the Sixth Report and Order and the MO&O on Reconsideration are both based on the NTSC and the DTV services accepting some interference. In the most recent table of allotments, WGAL Lancaster receives a baseline of 21.6% interference from NTSC and the Commission has proposed increasing this interference level by an additional 1.46%. This proposal indicates an increase of 4.3% above the baseline, or 2.84% above the Commission's proposed level. This is not a completely unreasonable level of interference to be received by DTV. In reference, another station in the Lancaster PA market, WLYH, channel 15 is proposed to receive 7.5% of additional interference, according to the table of allotments. Mountain's station, while not predicted to receive significant interference from this proposal, is scheduled to receive an additional 19% of interference to their NTSC signal from DTV sources. The proposed interference levels are considerably below the levels used elsewhere by the Commission. Therefore, this channel is presented as a viable alternative to the previously selected channel 46.

Robert W. Fisher

Communications Consultant Third Coast Broadcasting, Inc.

#### EXHIBIT #2 RESULTS OF FLR PROGRAM ANALYSIS

#### BASELINE INTERFERENCE WITH CHANNEL 46

#### WITH PROPOSED CHANNEL &

Analysis of: 45N MD BALTIMORE		Analysis of: 45H MD BALTIMORE	
POPULA		POPULATION	AREA (sq km)
within Noise Limited Contour 5986		within Noise Limited Contour 5986372	19575.7
not affected by terrain losses 5815	· · · · · · · · · · · · · · · · · · ·	not affected by terrain losses 5815995	18639.5
	537 422.8	lost to NTSC IX 54537	422.8
lost to additional IX by ATV 229		lost to additional IX by ATV 229962	169.1
iost to all IX 284	499 591.9	lost to all IX 284499	591.9
Analysis of: 46A ND BALTINORE		Analysis of: 46A NO BALTIMORE	
HAAT 386.0 m, ATV ERP 50.0 kW		HAAT 386.0 m, ATV ERP 50.0 kW	
POPULA	TION AREA (sq km)	POPULATION	AREA (sq km)
within Noise Limited Contour 5986	<b>37</b> 2 19573.7	within Noise Limited Contour 5986372	19573.7
not affected by terrain losses 5907	954 19130.8	not affected by terrain losses 5907954	19130.8
lost to NTSC 1X	<b>39</b> 6 48.3	lost to NTSC IX 7896	48.3
lost to additional IX by ATV 128	1 <b>39</b> 813.4	lost to additional IX by ATV 127953	805.3
lost to ATV IX only 136	<b>03</b> 5 861.7	lost to ATV IX only 135849	853.7
lost to all IX 136	035 861.7	lost to all IX 135849	853.7
percent match ATV/NTSC 9	9.5 98.9	percent match ATV/NTSC 99.5	98.9
Analysis of: 69N PA ALLENTOWN		Analysis of: 69M PA ALLENTOWN	
POPULA	TION AREA (sq km)	POPULATION	AREA (sq km)
within Noise Limited Contour 2338		within Noise Limited Contour 2338472	12510.4
not affected by terrain losses 1927		not affected by terrain losses 1927412	9999.6
	180 112.0	lost to NTSC IX 12180	112.0
	734 315.9	lost to additional IX by ATV 182734	315.9
	914 427.8	lost to all IX 194914	427.8
Analysis of: 46A PA ALLENTOWN	727.0	Anelysis of: 46A PA ALLENTONN	747.70
HAAT 313.0 m, ATV ERP 50.0 kW		HAAT 313.0 m, ATV ERP 50.0 kW	
POPULA	TION AREA (sq km)	POPULATION	AREA (sq lan)
within Noise Limited Contour 2338		within Noise Limited Contour 2338472	12510.4
			11390.9
not affected by terrain losses 2151		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	329 231.9	lost to NTSC IX 33329	231.9
	874 243.9	lost to additional IX by ATV 23104	191.9
	770 387.8	lost to ATV IX only 28669	279.9
	203 475.8	lost to all IX 56433	423.8
	9.7 99.6	percent match ATV/NTSC 99.8	99.6
Analysis of: BN CT NEW HAVEN		Analysis of: SN CT NEW MAVEN	
POPUL		POPULATION	
within Noise Limited Contour 6703		within Noise Limited Contour 6703557	28276.3
not affected by terrain losses 6061	1742 25665.0	not affected by terrain losses 6061742	<b>2566</b> 5.0
lost to NTSC IX 1372	2130 2539.3	lost to NTSC IX 1372130	2539.3
lost to additional IX by ATV 163	<b>1472</b> 1055.7	lost to additional IX by ATV 163472	1055.7
lost to all IX 1535	<b>i602 3595</b> .0	lost to all IX 1535602	3595.0
Analysis of: 10A CT NEW HAVEN		Analysis of: 10A CT NEW NAVEN	
HAAT 363.0 m, ATV ERP 8.6 kW		HAAT 363.0 m, ATV ERP 8.6 kW	
POPULA	TION AREA (sq km)	POPULATION	AREA (sq km)
within Noise Limited Contour 6703	<b>1557</b> 2 <b>6</b> 276.3	within Noise Limited Contour 6703537	26276.3
not affected by terrain losses 6252	2776 26176.9	not affected by terrain losses 6252776	26176.9
lost to NTSC IX 725	<b>28</b> 6 3223.1	lost to NTSC 1X 725286	3223.1
lost to additional IX by ATV 18	1523 327.9	lost to additional IX by ATV 186523	327.9
	399.9	lost to ATV IX only 203654	399.9
	1809 3551.0	lost to all IX 911809	3551.0
	93.2 89.9	percent match ATV/NTSC 93.2	89.9
Analysis of: 40m NY SINGHAMTON		Analysis of: 40% NY BINGHAMTON	*****
POPUL	ATION AREA (sq km)	POPULATION	AREA (sq km)
	0076 14856.6	within Noise Limited Contour 620076	14856.6
	5546 12245,2	not affected by terrain losses 445546	12245.2
	6412 208.0	lost to NTSC IX 4412	208.0
lost to additional IX by ATV	348 16.0	lost to additional IX by ATV 348	16.0
		lost to all IX 4760	223.9
Analysis of: SA NY BINGHAMTON	4 <b>76</b> 0 223.9	Analysis of: BA NY SINGNANTON	28.3.7
HAAT 375.0 m, ATV ERP 3.2 kW	STIME AND A THE STATE OF THE ST	HAAT 375.0 m, ATV ERP 3.2 kM POPULATION	4864 /
POPULI			
	0076 14856.6	within Noise Limited Contour 620076	14856.6
	7927 14552.7	not affected by terrain losses 597927	14552.7
	4336 399.9	lost to NTSC IX 64336	399.9
lost to additional IX by ATV	763 96.0	lost to additional IX by ATV 763	96.0
	1220 140.0	lost to ATV IX only 1220	140.0
· · · · · · · · · · · · · · · · · · ·	<b>509</b> 9 495.9	lost to all IX 65099	495.9
percent match ATV/NTSC	99.9 99.7	percent match ATV/NTSC 99.9	99.7
		BASELINE INTERFERENCE WITH CHA	INNEL 46

Analysis of: SN PA LANCASTER			WITH PROPOSED CHANNEL 8	
	MATION	AREA (sq km)		
within Moise Limited Contour 4	695300	28265.9	Analysis of: SH PA LANCASTER	
not affected by terrain losses 3	553155	23944.6	POPULATION	AMEA (mg lum)
1000 10 11100 111	766348	2241.3	within Noise Limited Contour 4695380	20265.9
lost to additional IX by ATV	51265	366.8	not affected by terrain losses 3553155	23944.6
*	819633	2608.1	lost to NTSC 1X 768348	2241.3
Anelysis of: 58A PA LANCASTER			lost to additional IX by ATV 152072	782.0
HAAT 415.0 m, ATV ERP 382.7 KH			lost to all IX 920420	3023.3
	ULATION	AREA (sq km)	Analysis of: 58A PA LANCASTER	
	695300	28265.9	HAAT 415.0 m, ATV ERP 382.7 KV	4554 4 t t
	224050	24948.4	POPULATION	
	367465	858.6	within Noise Limited Contour 4695380	28265.9
	992215	2668.7	not affected by terrain losses 4224050	24948.4 258.6
	190758 3596 <b>8</b> 0	2962.8	lost to NYSC IX 367465 lost to additional IX by ATV 992215	2686.7
lost to all IX 15 percent match ATY/NTSC	95.4	3547.4 94.0	lost to additional IX by ATV 992215 lost to ATV IX only 1190756	2962.8
Analysis of: 9N DC WASHINGTON	72.4	<del>74</del> .0	lost to all IX 1359680	3547.4
•	ULATION	AREA (sq km)	percent match ATV/NTSC 95.4	94.0
	511733	26027.6	Analysis of: 9N DC WASHINGTON	• • • • • • • • • • • • • • • • • • • •
	388221	23831.3	POPULATION	AREA (sq km)
lost to MTSC IX	88932	948.1	within Noise Limited Contour 6511733	26027.6
lost to additional IX by ATV	Ö	0.0	not affected by terrain losses 6388221	23831.3
lost to sil 1X	88932	948.1	lost to NTSC IX 88932	948.1
Analysis of: 34A DC WASHINGTON			iost to additional IX by ATV 0	0.0
MAAT 235.0 m, ATV ERP 1000.0 kW			lost to all IX 88932	948.1
POP	ULATION	AREA (sq km)	Analysis of: 34A DC WASHINGTON	
within Noise Limited Contour 6	511733	26027.6	HAAT 235.0 m, ATV ERP 1000.0 kW	
not affected by terrain losses 6	457299	24831.5	POPULATION	
lost to NTSC IX	525	12.0	within Noise Limited Contour 6511733	26027.6
lost to additional IX by ATV	17101	196.0	not affected by terrain losses 6457299	24831.5
lost to ATV IX only	17524	204.0	Lost to NTSC IX 525	12.0
lost to all IX	17626	208.0	lost to additional IX by ATV 17101	196.0
percent match ATV/NTSC	100.0	100.0	lost to ATV IX only 17524	204.0
Analysis of: 7N DC WASHINGTON		ARCA dam has	lost to all IX 17626	<b>208.</b> 0 1 <b>00.</b> 0
	ULATION	AREA (sq km)	percent metch ATY/NTSC 100.0	100.0
	511733 3 <b>962</b> 62	26027.6 23851.3	Analysis of: 7N DC WASHINGTON POPULATION	AREA (sq lon)
lost to MTSC IX	31916	636.1	within Noise Limited Contour 6511733	26027.6
lost to additional 1X by ATV	3.710 D	0.0	not affected by terrain losses 6396262	25851.3
lost to all IX	31916	636.1	lost to NTSC IX 31916	636.1
Analysis of: 39A DC WASHINGTON	3,7,0	050,,	lost to additional IX by ATV 0	0.0
MAAT 235.0 m, ATV ERP 1000.0 kW			lost to all IX 31916	636.1
	<b>ULATION</b>	AREA (sq km)	Analysis of: 39A DC WASHINGTON	
	511733	26027.6	MAAT 235.0 m, ATV ERP 1000.0 kW	
	456127	24779.5	POPULATION	AREA (sq km)
lost to NTSC 1X	3485	120.0	within Noise Limited Contour 6511733	26027.6
lost to additional IX by ATV	448515	1328.2	not effected by terrain losses 6456127	24779.5
	450186	1372.2	lost to NTSC 1X 3485	120.0
	452000	1445.2	lost to additional IX by ATV 446515	1326.2
percent match ATV/MTSC	93.3	95.4	lost to ATV IX only 450186	1372.2
Analysis of: 9N NJ SECAUCUS			lost to all IX 452000	1448.2
	NULATION .	AREA (sq km)	percent metch ATV/NTSC 93.3	95.4
	292449	20921.4	Analysis of: 9N NJ SECAUCUS	. ABPS 4
	<b>784978</b> 8 122 <b>88</b> 4 1	26138.6	POPULATION within Noise Limited Contour 18292449	I AREA (sq km) 28921.4
		3461.5		261 <b>38</b> .6
lost to additional IX by ATV lost to all IX	57356 1286197	555.0 4016.4	not affected by terrain loases 17869788 lost to NYSC IX 1228641	3461.5
Analysis of: 38A NJ SECAUCUS	1200177	4010.4	lost to additional IX by ATV 57356	555.0
HAAT 500.0 m, ATV ERP 136.4 km			lost to all IX 1286197	4016.4
	PULATION	AREA (sq km)	Analysis of: 38A NJ SECAUCUS	T\$ 146 T
	1292449	28921.4	HAAT 500.0 m, ATV ERP 136.4 kM	
	9007738	27013.0	POPULATION	AREA (eq lon)
lost to MTSC IX	67913	586.9	within Noise Limited Contour 18292449	28921.4
lost to additional IX by ATV	24483	163.7	not affected by terrain losses 18007738	27013.0
lost to ATV IX only	40260	295.4	lost to NTSC IX 67913	586.9
lost to all IX	92396	750.6	lost to additional IX by ATV 24483	163.7
percent metch ATV/NTSC	99.9	99.5	lost to ATV IX only 40260	295.4
			lost to all IX 92396	750.6
			percent match ATV/NTSC 99.9	99.5

sithin Rolas Lisited Contour not affected by terrain losses (1987) 22820-9 (2820-9)	Analysis of: BM PA LANCASTER			WITH PROPOSED CHANNEL 8	
### Analysis of: Sept. Actional Control of Sept. 1   1997		POPULATION	AREA (sa km)		
Lost to afficient IX by ATV   5126   366.8   Section   11 by ATV   5126   366.8   Section   12 by ATV   5126   366.9   S				Analysis of: BN PA LANCASTER	
Section   Sect	not affected by terrain losses	3553155	23944.6	POPULATION .	AREA (sq km)
Lost to all IX Analysis of: 558 PP. LANCASTER MART 413.0 m, ATV ERP 382.7 by  **POPULATION** POPULATION** ANAlysis of: 558 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 558 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 558 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 558 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 558 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 590 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 590 PP. LANCASTER MART 415.0 m, ATV ERP 382.7 by  **POPULATION** ANAlysis of: 590 PP. LANCASTER **POPULATION** ANALYSIS OF: 790 PP. LANCASTER **POPULATION** ANALYSIS OF: 7	lost to NTSC IX	768348	2241.3		28265.9
Amaly sist of 1586 PA LANGASTER   PART 415.0 m , ATV ERP 382.7 but   Section 15	lost to additional IX by ATV	51285	366.8	not affected by terrain losses 3553155	23944.6
MART 415.0 m, ATV ERP 382.7 IM   MOPULATION   MEAN (sq km)   MOPULATION   MOPULATION   MEAN (sq km)   MOPULATION   MEAN (sq km)   MOPULATION	lost to all IX	819633	2608.1		
Within Noise Limited Contour	Analysis of: SEA PA LANCASTER				
Within Noise Limited Contour not affected by terrain losses   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24964.6   24966.6   24964.6   24966.6   24964.6   24966.6   24964.6   24966.6   24964.6   24966.6   24					3023.3
Description   Limited Contour   Part   Limit					
Lost to afficiental IX by ATV 92755 2288.7   See 1					
Lost to API XX only					
Lost to all IX 1399880 3547.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4 94.0   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4 94.0   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.4   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.5   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.5   SAFA1.4   SAFA1.4   Lest to difficult IX by ATV 992215 2488.7   percent metch ATV/XISC 95.5   SAFA1.5   percent metch ATV/XISC 95.5   percent					
Lost to all IX PATY 1990 3347.4  Parenum tanch ATY/FISC 95.4 94.0.  Within Moise Limited Contour not affected by terrain losses (557279 24831.5)  Amelysis of: 98 DC MARRIMOTON 0557279 948.1  MAT 255.0 S. ATY ERP 100.0 to 11733 26027.6  Amelysis of: 200.0 MARRIMOTON 05729 948.1  Inst to additional IX by ATV 0 0 0.0 to 10 to 11734 1773 26027.6  Inst to additional IX by ATV 0 0 0.0 to 10 to					
percent metch ATY/YESC 95.4 94.0   least to ATY IX only 190739   2982.8   3547.4   state of the ATY IX only 190739   2982.8   state of the ATY IX only 190739   2982.1   least to sate IX	the state of the s			777	
Amalysis of: 98 DC   MASSHINSTON   POPULATION   AREA (sq km)					
POPULATION   AREA (sq tm)		y3.4	94.0		
within Moise Limited Contour not affected by terrain losses (1987) 2948.1 and (1987) 2948.1 soft or within Moise Limited Contour not affected by terrain losses (1987) 2948.1 and (1987) 2948.1	•	DOMEN AT LON	4064 (no km)		
Lost to NYS LY   September   Cost of NYS LY   September   Cost of NYS LY   Cost of LI   X   September					74.0
Lost to MISC IX   B8952   948.1   Mithin Moise Limited Contour   B8952   948.1   Not to stall IX   B8952					AREA (on but
Lost to additional IX by ATV   0   0.0   0.0   10st to affected by terrain losses   6388221   23831.3   23821.3			-		
Topic					
Amalysis of: 36A DC MASHINGTON   NATE   Section   NATE		-			
MAT 235.0 m, ATV ERP 1000.0 kW   POPULATION   AREA (sq. km)   Sept. 25.0 m, ATV ERP 1000.0 kW   Sept. 26027.6   Sept. 26027.		00/JL	740.1		
Within Noise Limited Contour   Control   Con		an an			
within Noise Limited Contour 6511733 26027.6 Iont to NTSC IX 525 12.0 Iont to NTSC IX 1770 196.0 Iont to NTSC IX 1770 1770 196.0 Iont to ATV IX only 17524 204.0 Iont to ATV IX only 17526 208.0 Iont to ATV IX only 17526 208	india resid mit Mid But Ideolo i		ARFA (see km)		,,,,,,
Not affected by terrain losses   6457299   24831.5	within Maise Limited Contour				
Lost to MTSC IX   525   12.0   within Noise Limited Contour   6511733   26027.6   lost to ATV IX only   17526   208.0   lost to ATV IX only   17526   lost to ATV IX only   17526   lost					AREA (sa km)
Lost to additional IX by ATV 17101 196.0   not affected by terrain losses 6457299   24831.5   Lost to all IX   17526 208.0   Lost to additional IX by ATV   17101 196.0   Deprement match ATV/NTSC   100.0   100.0   Lost to additional IX by ATV   17101 196.0   Deprement match ATV/NTSC   100.0   100.0   Deprement match ATV/NTSC   1				within Noise Limited Contour 6511733	26027.6
Lost to ATV IX only   17526   204.0   Lost to NTSC IX   17526   208.0   Lost to Additionel IX by ATV   17101   196.0	lost to additional IX by ATV	17101	196.0		
Descript March ATV_MITSC   100.0   1		17524	204.0		12.0
Analysis of: 7M DC MASHINGTON	lost to all IX	17626	208.0	lost to additional IX by ATV 17101	196.0
Within Noise Limited Contour not affected by terrain loses	percent match ATV/NTSC	100.0	100.0	lost to ATV IX only 17524	204.0
Within Noise Limited Contour	Analysis of: 7N DC WASHINGTON			lost to all 1X 17626	208.0
Cost to NTSC IX   Signature   Cost to Signature   Cost to NTSC IX   Signature   Cost to Signature   Cost		POPULATION	AREA (sq km)	percent match ATV/NTSC 100.0	100.0
Cost to NTSC IX   S1916   636.1   Within Noise Limited Contour   6391733   26027.6	within Noise Limited Contour	6511733	26027.6	Analysis of: TN DC WASHINGTON	
Lost to additional IX by ATV   D   D   D   D   D   D   D   D   D	not affected by terrain losses	6396262	23851.3	POPULATION	AREA (sq km)
Lost to additional IX by ATV   31916   636.1   Lost to MTSC IX   31916   636.1   Lost to additional IX by ATV   0   0.	lost to NTSC IX	31916	636.1		
Lost to additional IX by ATV   0   0.0	lost to additional 1X by ATV	-			
MAAT 235.0 m, ATV ERP 1000.0 kN		31916	636.1		
## ## ## ## ## ## ## ## ## ## ## ## ##					
### ### ### ### ### ### ### ### ### ##	HAAT 235.0 m, ATV ERP 1000.0				636.1
Name					
Lost to NTSC IX					4554 4 L-1
Cost to additional IX by ATV					
Lost to ATV IX only				71.11.2	
Cost to all IX					
Description					
Analysis of: 9N NJ SECAUCUS  POPULATION AREA (sq km) within Noise Limited Contour 18292469 28921.4 289					
Description		73.3	72.4		:-:
Within Noise Limited Contour not affected by terrain losses   17869788   26138.6   2	ANNA TO THE THE THE SECTIONS	POPUI ATTOM	APPA (so ba)		
Note to Hisch   128641   3461.5   Within Noise Limited Contour   18292449   28921.4	within Maise Limited Contain				****
10st to NTSC IX   1228841   3461.5   within Noise Limited Contour   18292449   28921.4     10st to additional IX by ATV   57356   555.0   not affected by terrain losses   1228641   3461.5     10st to all IX   1286197   4016.4   lost to additional IX by ATV   57356   555.0     10st to NTSC IX   1228641   3461.5     10st to additional IX by ATV   57356   555.0     10st to additional IX by ATV   57356   555.0     10st to additional IX by ATV   1286197   4016.4     10st to additional					AREA (sa ku)
10st to additional IX by ATV   57356   1286197   4016.4   1286197   4016.4   128641   3461.5   128641   12864			•		
10st to all IX   1286197   4016.4   10st to NTSC IX   122841   3461.5					
Analysis of: 38A NJ SECAUCUS  HAAT 500.0 m, ATV ERP 136.4 kW  POPULATION AREA (sq km)  Hithin Noise Limited Contour 18292449 28921.4  not affected by terrain losses 18007738 27013.0  Lost to NTSC IX 67913 586.9  Lost to additional IX by ATV 24483 163.7  Lost to additional IX by ATV 24483 163.7  Lost to ATV IX only 40260 295.4  Lost to all IX 92396 750.6  Lost to ATV IX only 40260 295.4  Lost to all IX 92396 750.6					
HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.9 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4 kW   POPULATION   AREA (sq km)   HAAT 500.0 m, ATV ERP 136.4					
### POPULATION AREA (sq km) #### Noise Limited Contour not affected by terrain loses 18007738 27013.0 ### Lost to HTSC IX 67913 586.9 ### Lost to additional IX by ATV 24483 163.7 ### Lost to additional IX by ATV 40260 295.4 ### Lost to all IX 92396 750.6 ### Description AREA (sq km) ### HAAT 500.0 m, ATV ERP 136.4 kW ### POPULATION AREA (sq km) ### HAAT 500.0 m, ATV ERP 136.4 kW ### POPULATION AREA (sq km) ### Limited Contour 18292449 28921.4 ### Lost to additional IX by ATV 24483 163.7 ### Lost to ATV IX only 24483 163.7 ### Lost to ATV IX only 40260 295.4 ### Lost to ATV IX only 40260 295.4 ### Lost to all IX 92396 750.6		kV			
### ### ### ### ### ### ### ### ### ##			AREA (sq km)		
lost to NTSC IX     67913     586.9     within Noise Limited Contour     18292449     28921.4       lost to additional IX by ATV     26483     163.7     not affected by terrain losses     18007738     27013.0       lost to ATV IX only     40260     295.4     lost to NTSC IX     67913     586.9       lost to all IX     92396     750.6     lost to additional IX by ATV     24485     163.7       percent match ATV/NTSC     99.9     99.5     lost to ATV IX only     40260     295.4       lost to all IX     92396     750.6	within Noise Limited Contour				
lost to NTSC IX   67913   586.9   within Noise Limited Contour   18292449   28921.4					AREA (sq km)
tost to ATV IX only 40260 295.4 lost to MTSC IX 67913 586.9 lost to all IX 92396 750.6 lost to additional IX by ATV 24483 163.7 percent match ATV/MTSC 99.9 99.5 lost to ATV IX only 40260 295.4 lost to all IX 92396 750.6	lost to NTSC IX	67913	586.9	***************************************	
lost to all IX 92396 750.6 lost to additional IX by ATV 24483 163.7 percent match ATV/NTSC 99.9 99.5 lost to ATV IX only 40260 295.4 lost to all IX 92396 750.6	lost to additional 1X by ATV	24483	163.7		
percent match ATV/NTSC 99.9 99.5 lost to ATV IX only 40260 295.4 lost to all IX 92396 750.6	lost to ATV IX only	40260	295.4		
lost to all IX 92396 750.6				T:_	
	percent match ATV/WTSC	99.9	99.5		
percent match ATV/NTSC 99.9 99.5					
				percent match ATV/NTSC 99.9	99.5

## BASELINE INTERFERENCE WITH CHANNEL 46

#### WITH PROPOSED CHANNEL 8

£2 K1.

Analysis of: 63N NJ NEWTON			Analysis of: 63M NJ NEWTON		
	PULATION	AREA (sq km)	Macyola of Com no nearon	POPULATION	AREA (sq km)
within Noise Limited Contour	415790	13628.8	within Noise Limited Contour	9415790	13428.8
not affected by terrain losses	3403764	11168.4	not affected by terrain losses	8403764	11168.4
lost to NTSC 1X	16353	189.0	lost to NTSC 1X	16353	189.0
	780351	410.1	lost to additional IX by ATV	1780351	410.1
	796704	599.0	lost to all IX	1796704	599.0
Analysis of: 8A NJ NEWTON			Anelysis of: 8A NJ NEWTON	.,,,,,,,	******
MAAT 223.0 m, ATV ERP 3.2 kW			NAAT 223.0 m, ATV ERP 3.2	k <b>M</b>	
	MILATION	AREA (sq km)		POPULATION	AREA (sq km)
within Noise Limited Contour	9415790	13628.8	within Noise Limited Contour	9415790	13628.8
not affected by terrain losses	9219063	12897.1	not affected by terrain losses	9219063	12897.1
	5506357	1238.3	lost to NTSC IX	3506357	1258.5
lost to additional IX by ATV	1539	124.6	lost to additional IX by ATV	1649	128.6
lost to ATV IX only	17114	209.1	lost to ATV IX only	38427	249.3
	3509896	1362.9	lost to all IX	3510006	1366.9
percent match ATV/NTSC	63.7	93.6	percent match ATV/NTSC	63.7	93.6
Analysis of: 7N NY NEW YORK		75.5	Analysis of: 7N NY NEW YORK	•••	70.0
	PULATION	AREA (sq km)		POPULATION	AREA (sq km)
	B249159	28749.7	within Noise Limited Contour	18249159	28749.7
	7853961	26142.6	not affected by terrain losses	17853961	26142.6
lost to MTSC 1X	665067	2251.7	lost to NTSC IX	665067	2251.7
lost to additional IX by ATV	43682	459.1	lost to additional IX by ATV	43682	459.1
lost to all IX	706749	2710.9	lost to all IX	706749	2710.9
Analysis of: 45A NY NEW YORK	,	£1.1017	Analysis of: 45A NY NEW YORK	100142	55. ,
HAAT 491.0 m. ATV ERP 164.3 kW			MAAT 491.0 m, ATV ERP 164.3	ш	
	PULATION	AREA (sq km)	10-12 mg/mg/mg/mg/mg/mg/mg/mg/mg/mg/mg/mg/mg/m	POPULATION	AREA (sq los)
	8249159	28749.7	within Noise Limited Contour	18249159	28749.7
	7955727	26745.5	not affected by terrain losses		26745.5
lost to MTSC IX	43438	395.3	tost to MTSC IX	43438	395.3
lost to additional IX by ATV	68183	291.4	lost to additional IX by ATV	68183	291.4
lost to ATV IX only	80461	407.2	lost to ATV IX only	80461	407.2
lost to all IX	111821	686.7	iost to all IX	111821	686.7
percent metch ATV/NTSC	99.9	99.5	percent match ATV/NTSC	99.9	99.5
Analysis of: 53N MJ ATLANTIC CITY		,,,,	Analysis of: 53N NJ ATLANTIC CITY		,,,,
· · · · · · · · · · · · · · · · · · ·	PULATION	AREA (sq km)	MINERY OF THE RESERVED OF THE	POPULATION	AREA (sq km)
within Noise Limited Contour	203408	1323.2	within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2	not affected by terrain losses		1323.2
lost to MTSC 1X	0	0.0	lost to NTSC IX	0	0.0
lost to additional IX by ATV	ŏ	0.0	lost to additional IX by ATV	ŏ	0.0
lost to all IX	ă	0.0	lost to all IX	Ď	0.0
Analysis of: 46A NJ ATLANTIC CITY	•	0.0	Amelysis of: 8A NJ ATLANTIC CITY	•	<b></b>
HAAT 85.0 m. ATV ERP 50.0 kW			HAAT 85.0 m. ATV ERP 3.2		
	PULATION	AREA (sq km)	ment water in the Plat Sep	POPULATION	AREA (ag km)
within Noise Limited Contour	203408	1323.2	within Noise Limited Contour	203408	1323.2
not affected by terrain losses	203408	1323.2	not affected by terrain losses		1323.2
lost to MTSC IX	0	0.0	lost to MTSC IX	0	0.0
lost to additional IX by ATV	Ŏ	0.0	lost to additional IX by ATV	ŏ	0.0
lost to ATV IX only	0	0.0	lost to ATV IX only	Ö	0.0
lost to all IX	ä	0.0	lost to all IX	Ď	0.0
percent match ATV/NTSC	100.0	100.0	percent match ATV/NTSC	100.0	100.0
		14014	parcent mater nitrates	.44.4	.40.0

416804 calls to Longley-Rice; path distance increment 1.00 km 422722 calls to Longley-Rice; path distance increment 1.00 km

#### **CERTIFICATE OF SERVICE**

I hereby certify that, this 30th day of July 1998, I caused a copy of the foregoing Petition for Reconsideration to be served by First Class United States mail, postage prepaid, on:

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J. Geoffrey Beatle